

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ABU DHABI COMMERCIAL BANK, et al.,	:	Civil Action No. 1:08-cv-07508
Individually and On Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiffs,	:	DECLARATION OF DANIEL S.
	:	DROSMAN IN SUPPORT OF PLAINTIFFS'
vs.	:	OPPOSITION TO DEFENDANTS' JOINT
	:	MOTION FOR SUMMARY JUDGMENT
MORGAN STANLEY & CO.	:	PURSUANT TO THE COURT'S JUNE 22,
INCORPORATED, et al.,	:	2012 DIRECTIVE
	:	
Defendants.	:	
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I, Daniel S. Drosman, declare as follows:

1. I am an attorney admitted to practice before this Court, and I am a partner of the law firm of Robbins Geller Rudman & Dowd LLP, counsel for plaintiffs in the above-captioned matter. I submit this Declaration in support of Plaintiffs' Opposition to Defendants' Joint Motion for Summary Judgment pursuant to the Court's June 22, 2012 directive.

2. Attached are true and correct copies of the following documents:

Tab 1	Excerpts from the Deposition Transcript of Sascha Klaus dated October 26, 2011
Tab 2	Excerpts from the Deposition Transcript of Sascha Klaus dated October 27, 2011
Tab 3	Excerpts from the Deposition Transcript of Paul Quistberg dated July 22, 2011
Tab 4	Excerpts from the Deposition Transcript of Christopher Burton dated November 15, 2011
Tab 5	Excerpts from the Deposition Transcript of Yaser Humaidan dated October 3, 2011
Tab 6	Excerpts from the Deposition Transcript of David Wilson dated October 5, 2011
Tab 7	Excerpts from the Deposition Transcript of David Wilson dated October 6, 2011
Tab 8	Excerpts from the Deposition Transcript of Frederic Becker dated September 26, 2011
Tab 9	Excerpts from the Deposition Transcript of Kenneth M. Guy dated February 9, 2010
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Tab 12	Excerpts from the Deposition Transcript of Byung-Gyu Pahk dated October 12, 2011
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Tab 14	Excerpts from the Deposition Transcript of Christian Herter dated September 28, 2011
Tab 15	Excerpts from the Deposition Transcript of Phillip Picariello dated September 9, 2011
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Tab 17	Excerpts from the Deposition Transcript of Dennis Walsh dated November 21, 2011
Tab 18	Excerpts from the Deposition Transcript of James Smigiel dated February 4, 2010
Tab 19	Excerpts from the Deposition Transcript of Vikas Vijayan dated January 19, 2010
Tab 20	Excerpts from the Deposition Transcript of Andrew Baron dated September 15, 2011
Tab 21	Excerpts from the Deposition Transcript of Charles Cox dated February 17, 2010
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Tab 23	S&P-ADCB 0000001-24
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Tab 27	Moody's Approach to Rating Collateralized Loan Obligations
Tab 28	Plaintiffs' Deposition Exhibit 341 (Michalek, March 12, 2011)
Tab 29	PSI-MOODYS-RFN-000007-08
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Tab 32	Plaintiffs' Deposition Exhibit 607 (Kornfeld, June 28, 2011)
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Tab 41	Plaintiffs' Deposition Exhibit 598 (Clarkson, May 26, 2011)
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Tab 43	Excerpts from the Deposition Transcript of David Rosa dated April 6, 2011
Tab 44	Plaintiffs' Deposition Exhibit 148 (Guadagnuolo, January 13, 2011)
Tab 45	Plaintiffs' Deposition Exhibit 96 (Raiter, October 29, 2010)
Tab 46	Plaintiffs' Deposition Exhibit 561 (Wong, April 25, 2011)
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Tab 56	Plaintiffs' Deposition Exhibit 178 (Guadagnuolo, January 14, 2011)
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Tab 59	Plaintiffs' Deposition Exhibit 130 (Rooney, November 11, 2010)
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Tab 84	Plaintiffs' Deposition Exhibit 275 (Drennan, March 1, 2011)
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Tab 88	Plaintiffs' Deposition Exhibit 617 (Mallinson, July 15, 2011)
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Tab 113	Excerpts from the Deposition Transcript of Gregg Drennan dated March 1, 2011
Tab 114	MS_001295777-79
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Tab 116	Z0418116-20
Tab 117	Plaintiffs' Deposition Exhibit 278 (Drennan, March 1, 2011)
Tab 118	MS 000222478-80
Tab 119	Plaintiffs' Deposition Exhibit 72 (Grenadier, April 2, 2010)
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Tab 152	Comment on SEC Proposed Rules for Nationally Recognized Statistical Rating Organizations by William J. Harrington dated August 8, 2011
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Tab 162	Plaintiffs' Deposition Exhibit 20 (Moubarak, November 6, 2009)
Tab 163	MS 000137616-51
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Tab 165	Plaintiffs' Deposition Exhibit 35 (Moubarak, November 6, 2009)
Tab 166	Plaintiffs' Deposition Exhibit 385 (Rosa, April 5, 2011)
Tab 167	Plaintiffs' Deposition Exhibit 152 (Guadagnuolo, January 13, 2011)
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Tab 170	Plaintiffs' Deposition Exhibit 28 (Moubarak, November 6, 2009)
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Tab 200	Plaintiffs' Deposition Exhibit 558 (Wong, April 25, 2011)
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Tab 224	May 18, 2010 <i>King County</i> hearing transcript excerpt
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Tab 292	MDYS ADCB 790152-245

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Tab 296	“Wall Street and the Financial Crisis: Anatomy of a Financial Collapse,” Permanent Subcommittee on Investigations, United States Senate, Apr. 13, 2011
Tab 297	United States Senate, Permanent Subcommittee on Investigations’ Exhibit 86
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Tab 304	Troubled Loans Chart September 2007
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Tab 306	Plaintiffs’ Deposition Exhibit 325 (Tabe, March 9, 2011)
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Tab 322	Plaintiffs' Deposition Exhibit 143 (Rooney, November 11, 2010)
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Tab 324	Plaintiffs' Deposition Exhibit 2 (Woo, June 22, 2011)
Tab 325	MS 000121701-02
Tab 326	Plaintiffs' Deposition Exhibit 399 (Rosa, April 6, 2011)
Tab 327	S&P-ADCB 0018202-03
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Tab 329	Defendants' Deposition Exhibit 241 (Kahn, July 11, 2011)
Tab 330	Defendants' Deposition Exhibit 242 (Kahn, July 11, 2011)
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Tab 344	MS_001439320-21
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Tab 359	Plaintiffs' Deposition Exhibit 357 (Khakee, March 17, 2011)
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Tab 362	Plaintiffs' Deposition Exhibit 56 (Al Raheb, November 19, 2009)
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Tab 368	Plaintiffs' Deposition Exhibit 351 (Khakee, March 16, 2011)
Tab 369	CMA0001296-308
Tab 370	MDYS ADCB 106561
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Tab 372	MDYS ADCB 105868-70
Tab 373	CMA0000986-1295
Tab 374	Defendants' Deposition Exhibit 417 (Becker, September 26, 2011)
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Tab 376	SNPC0000467-68
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Tab 378	SNPCe00001701-07

Tab 379	BTRFLD000009-10
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Tab 381	Defendants' Deposition Exhibit 378 (Baron, September 15, 2011)
Tab 382	Defendants' Deposition Exhibit 360 (Baron, September 14, 2011)
Tab 383	CB0000001-05
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Tab 390	Defendants' Deposition Exhibit 602 (Allen, November 21, 2011)
Tab 391	Defendants' Deposition Exhibit 603 (Allen, November 21, 2011)
Tab 392	GIB0000041-42
Tab 393	Defendants' Deposition Exhibit 94 (Guy, February 9, 2010)
Tab 394	NACF000001
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Tab 399	Defendants' Deposition Exhibit 65 (Smigiel, February 4, 2010)
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Tab 401	SEI0000999-1002
Tab 402	<i>Cal. Pub. Emps. ' Ret. Sys. v. Moody's Corp.</i> , No. CGC-09-490241, slip op. (Cal. Super. Ct., Cnty. of San Francisco, June 1, 2010)
Tab 403	<i>King County, Wash. v. IKB Deutsche Industriebank AG</i> , No. 09 Civ. 8387 (SAS), slip op. (S.D.N.Y. Oct. 29, 2010)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 2nd day of July, 2012, at San Diego, California.

s/ DANIEL S. DROSMAN

 DANIEL S. DROSMAN

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 2, 2012.

s/ DANIEL S. DROSMAN
DANIEL S. DROSMAN

ROBBINS GELLER RUDMAN
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Mailing Information for a Case 1:08-cv-07508-SAS-DCF

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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